

# **Iowa Department of Natural Resources**

## **Title V Operating Permit**

**Name of Permitted Facility: Winnebago Industries, Inc.**  
**Facility Location: 1280 Olive Avenue, Hampton, IA 50441**  
**Air Quality Operating Permit Number: 03-TV-018-M001**  
**Expiration Date: June 17, 2008**

**EIQ Number: 92-5529**  
**Facility File Number: 35-01-010**

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### **Responsible Official**

**Name: Mr. Robert J. Olson**  
**Title: Senior Vice-President of Operations**  
**Mailing Address: 605 W. Crystal Lake Road, Forest City, IA 50436**  
**Phone #: (641) 585-6316**

### **Permit Contact Person for the Facility**

**Name: Mr. Wayne M. Venzke**  
**Title: Environmental Engineer**  
**Mailing Address: 605 W. Crystal Lake Road, Forest City, IA 50436**  
**Phone #: (641) 585-6760**

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

**For the Director of the Department of Natural Resources**

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Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
gr/dscf .....	grains per dry standard cubic foot
gr/100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NSPS .....	new source performance standard
ppmv .....	parts per million by volume
lb/hr .....	pounds per hour
lb/MMBtu .....	pounds per million British thermal units
scfm.....	standard cubic feet per minute
TPY .....	Tons per year
USEPA.....	United States Environmental Protection Agency

## Pollutants

PM.....	particulate matter
PM <sub>10</sub> .....	particulate matter ten microns or less in diameter
SO <sub>2</sub> .....	sulfur dioxide
NO <sub>x</sub> .....	nitrogen oxides
VOC .....	volatile organic compound
CO .....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List -

Facility Name: Winnebago Industries, Inc.

Permit Number: 03-TV-018

Facility Description: Reinforced Plastics Production

## Equipment List

### A. Grind Booths

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
EP-P01	EU-P01	Grind Booth
EP-P02	EU-P02	Grind Booth
EP-P03	EU-P03	Grind Booth
EP-P04	EU-P04	Grind Booth
EP-P05	EU-P05	Grind Booth
EP-P06	EU-P06	Grind Booth
EP-P07	EU-P07	Grind Booth

### B. Gelcoat Booths

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
EP-S01	EU-S01	Small Parts Gelcoat Booth
EP-S02	EU-S02	Small Parts Gelcoat Booth
EP-S10	EU-S10	Backwall Gelcoat Booth
EP-S11	EU-S11	Backwall Gelcoat Booth
EP-S15	EU-S15	Offline Gelcoat Booth
EP-S21	EU-S21	Backwall Gelcoat Booth

### C. Chop Spray-up Booths

<b>Emission Point Number</b>	<b>Associated Emission Unit(s) Number (s)</b>	<b>Associated Emission Unit Description</b>
EP-S03	EU-S03	Small Parts Chop Spray-up Booth
EP-S04	EU-S04	Small Parts Chop Spray-up Booth
EP-S05	EU-S05	Small Parts Chop Spray-up Booth
EP-S06	EU-S06	Small Parts Chop Spray-up Booth
EP-S07	EU-S07	Backwall Chop Spray-up Booth
EP-S08	EU-S08	Backwall Chop Spray-up Booth
EP-S09	EU-S09	Backwall Chop Spray-up Booth
EP-S14	EU-S14	Offline Chop Spray-up Booth

### D. Other Booths

<b>Emission Point Number</b>	<b>Associated Emission Unit(s) Number (s)</b>	<b>Associated Emission Unit Description</b>
EP-S16	EU-S16	Paint/Foam/Grind Booth
EP-S17	EU-S17	Foam Application Booth
EP-S18	EU-S18	Tooling Gelcoat/Chop Booth
EP-S19	EU-S19	Reactive Hot Melt Glue Machine
EP-S20	EU-S20	Paint Booth

### E. Miscellaneous Equipment (fugitive emissions)

<b>Emission Point Number</b>	<b>Associated Emission Unit(s) Number (s)</b>	<b>Associated Emission Unit Description</b>
EP-909-F	EU-909-F	Tool Repair
EP-910-F	EU-910-F	Tool Building
EP-920-F	EU-920-F	Fab/Off-Line
EP-923-F	EU-923-F	Finish Sealants/Adhesives
EP-924-F	EU-924-F	Aluminum Prep

### Insignificant Equipment List\*

Insignificant Emission Unit Number	Insignificant Emission Unit Description
H1-LPSYS-U	Propane System
H1-MAKUP-U	Air Makeup Emissions
H1-HEAT-U	Unit Heaters < 10 mmBTU
H1-Paint-U	Touchup Painting
H1-T01-U	Resin Storage Tank 1
H1-T02-U	Resin Storage Tank 2
H1-MCTE-U	Maintenance Activities
H1-WELD-U	Emissions from Welding
H1-SOLV-F	Solvent Parts Washer

\* Insignificant equipment is based on the exclusions listed in 567 IAC 22.103.

## II. Plant-Wide Conditions

Facility Name: Winnebago Industries, Inc. Hampton Facility  
Permit Number: 03-TV-018

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

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### Permit Duration

The term of this permit is: five (5) years from date of issuance  
Commencing on: June 18, 2003  
Ending on: June 17, 2008

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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### Emission Limits

*Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:*

Opacity (visible emissions): 40% opacity  
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide SO<sub>2</sub>: 500 parts per million by volume  
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)<sup>1</sup>:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

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<sup>1</sup> This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

Particulate Matter (federally enforceable)<sup>2</sup>:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures:

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

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<sup>2</sup> This is the current language in the Iowa SIP, and is enforceable by EPA.  
Winnebago Industries, Inc. - Hampton



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## Compliance Plan

*The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.*

Unless otherwise noted in Section III of this permit, Winnebago-Hampton is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Winnebago-Hampton shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

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## Other NESHAP

### *40 CFR 63 Subpart A*

### *40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production*

Parts of this facility will be subject to the Reinforced Plastic Composites Production NESHAP. As such, this facility shall comply with the appropriate work practice standards as required in 60 CFR §63.5805 and outlined in Table 4 of the same subpart. This NESHAP was published in the Federal Register on April 21, 2003. A copy of this rule can be found in Appendix B of this permit.

The following sources are subject to WWWW requirements:

EP-S01	Small Parts Gelcoat Booth	EP-S03	Small Parts Chop Spry-up Booth
EP-S02	Small Parts Gelcoat Booth	EP-S04	Small Parts Chop Spray-up Booth
EP-S10	Backwall Gelcoat Booth	EP-S05	Small Parts Chop Spray-up Booth
EP-S11	Backwall Gelcoat Booth	EP-S06	Small Parts Chop Spray-up Booth
EP-S15	Offline Gelcoat Booth	EP-S07	Backwall Chop Spray-up Booth
EP-S21	Backwall Gelcoat Booth	EP-S08	Backwall Chop Spray-up Booth
		EP-S09	Backwall Chop Spray-up Booth
		EP-S14	Offline Chop Spray-up Booth
		EP-S-18	Tooling Gelcoat Chop Booth

Authority for Requirement: 40 CFR Part 63 Subpart WWWW

### *40 CFR 63 Subpart PPPP – Surface Coating of Plastic Parts and Products*

Parts of this facility will be subject to 40 CFR Part 63 Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. As such, this facility shall comply with the appropriate work practice standards as required in 60 CFR §63.3094. A copy of this rule can be found in Appendix C of this permit.

The following sources are subject to PPPP requirements:

EP-S20      Paint Spray Booth

Authority for Requirement: 40 CFR Part 63 Subpart PPPP

*40 CFR 63 Subpart Mmmm<sup>3</sup> – Surface Coating of Miscellaneous Metal Parts and Products*

Parts of this facility will be subject to 40 CFR Part 63 Subpart Mmmm – National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The notification and compliance requirements can be found in the copy of the regulations found in Appendix D of this document.

The following sources are subject to Mmmm requirements:

EP-S20      Paint Spray Booth

Authority for Requirement: 40 CFR Part 63 Subpart Mmmm

Authority for Requirement: 40 CFR 63.52; 567 IAC 23.1(4)"b"(2)

### III. Emission Point-Specific Conditions

Facility Name: Winnebago Industries Inc. Hampton

Permit Number: **03-TV-018**

**Emission Point ID Number: See Table A-1**

#### **Applicable Requirements**

*The following requirements apply to the emission points identified in Table A-1.*

Table A-1

Emission Point Number	Control Equipment Number	Control Equipment Description	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (ft/min)
EP-P01	H1-P01-CE	dry filter	EU-P01	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P02	H1-P02-CE	dry filter	EU-P02	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P03	H1-P03-CE	dry filter	EU-P03	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P04	H1-P04-CE	dry filter	EU-P04	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P05	H1-P05-CE	dry filter	EU-P05	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P06	H1-P06-CE	dry filter	EU-P06	grind booth <sup>(1)</sup>	fiberglass parts	3.2
EP-P07	H1-P07-CE	dry filter	EU-P07	grind booth <sup>(1)</sup>	fiberglass parts	3.2

<sup>(1)</sup> internally vented

#### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from each emission point identified in Table A-2 shall not exceed the following specified levels.*

Table A-2

Emission Point Number	Emission Unit Number	Opacity	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	Iowa DNR Construction Permit #
EP-P01	EU-P01	40% <sup>(1)</sup>	0.1	0.27	0.27	85-A-012-S3
EP-P02	EU-P02	40% <sup>(1)</sup>	0.1	0.27	0.27	85-A-013-S3
EP-P03	EU-P03	40% <sup>(1)</sup>	0.1	0.27	0.27	85-A-014-S3
EP-P04	EU-P04	40% <sup>(1)</sup>	0.1	0.27	0.27	85-A-015-S3
EP-P05	EU-P05	40% <sup>(1)</sup>	0.1	0.27	0.27	85-A-016-S3
EP-P06	EU-P06	40% <sup>(1)</sup>	0.1	0.27	0.27	88-A-104-S4
EP-P07	EU-P07	40% <sup>(1)</sup>	0.1	0.27	0.27	84-A-042-S4

<sup>(1)</sup> Per DNR Air Quality Policy 3-b-08, Opacity Limits, If visible emissions are observed outside the building or structure that contains this emission unit other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard. The permit holder shall file

an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Table A-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	Iowa DNR Construction Permits referenced in Table A-2 567 IAC 23.3(2)"d"
PM	0.1 gr/dscf	Iowa DNR Construction Permits referenced in Table A-2 567 IAC 23.3(2)"a"
PM	0.27 lb/hr	Iowa DNR Construction Permits referenced in Table A-2
PM <sub>10</sub>	0.27 lb/hr	Iowa DNR Construction Permits referenced in Table A-2

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

Process throughput:

1. The filters shall be operated and maintained according to manufacturer's instructions and specifications.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. Record, on a monthly basis, all maintenance (if any) of dry filters.

Authority for Requirement: Iowa DNR Construction Permits specified in Table A-2

### **Periodic Monitoring Requirements**

*The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.*

No periodic monitoring is required at this time.

**Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒**

**Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐**

For the emission points specified in Table A-2:

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

## Emission Point ID Number: See Table B-1

### Applicable Requirements

*The following requirements apply to the emission points identified in Table B-1.*

Table B-1

Emission Point Number	Control Equipment Number	Control Equipment Description	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (lb/hr)
EP-S01	H1-S01-CE	dry filter	EU-S01	Small Parts Gelcoat Booth	fiberglass gelcoat	26.0
EP-S02	H1-S02-CE	dry filter	EU-S02	Small Parts Gelcoat Booth	fiberglass gelcoat	26.0
EP-S10	H1-S10-CE	dry filter	EU-S10	Backwall Gelcoat Booth	fiberglass gelcoat	10.1
EP-S11	H1-S11-CE	dry filter	EU-S11	Backwall Gelcoat Booth	fiberglass gelcoat	10.1
EP-S15	H1-S15-CE	dry filter	EU-S15	Offline Gelcoat Booth	fiberglass gelcoat	5.8
EP-S21	H1-S21-C	Dry filter	EU-S21	Backwall Gelcoat Booth	Fiberglass gelcoat	132.0

### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from each emission point identified in Table B-2 shall not exceed the following specified levels.*

Table B-2

Emission Point Number	Emission Unit Number	Opacity	PM (gr/scf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	VOC (ton/yr)	Iowa DNR Construction Permit #
EP-S01	EU-S01	40% <sup>(1)</sup>	0.01	0.4	0.12 <sup>(3)</sup>	82.1 <sup>(2)</sup>	85-A-003-S8
EP-S02	EU-S02	40% <sup>(1)</sup>	0.01	0.4	0.12 <sup>(3)</sup>		85-A-004-S8
EP-S10	EU-S10	40% <sup>(1)</sup>	0.01	0.4	0.13 <sup>(3)</sup>		85-A-009-S8
EP-S11	EU-S11	40% <sup>(1)</sup>	0.01	0.4	0.13 <sup>(3)</sup>		97-A-638-S7
EP-S15	EU-S15	40% <sup>(1)</sup>	0.01	0.4	0.09 <sup>(3)</sup>		85-A-018-S8
EP-S21	EU-S21	40% <sup>(1)</sup>	0.01	0.4	0.4		04-A-587-S3

<sup>(1)</sup> Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of “No Visible Emissions” will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an “indicator opacity exceedence report” with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Bubble limit – total VOCs shall not exceed 82.1 tons per twelve-month rolling total for Small Parts Gelcoat Booths (EP-S01, S02) and Backwall Gelcoat Booths (EP-S10, S11, S15, and S21) combined.

<sup>(3)</sup> Limit requested by permittee.

Table B-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	Iowa DNR Construction Permits referenced in Table B-2 567 IAC 23.3(2)"d"
PM	0.01 gr/scf	Iowa DNR Construction Permits referenced in Table B-2 567 IAC 23.4(13)
PM	0.40 lb/hr	Iowa DNR Construction Permits referenced in Table B-2
PM <sub>10</sub>	0.40 lb/hr	Iowa DNR Construction Permits referenced in Table B-2
VOC	82.1 tons/yr →	Iowa DNR Construction Permits referenced in Table B-2 85-A-003-S8, 85-A-004-S8, 85-A-009-S8, 97-A-638-S7, 85-A-018-S8, 04-A-587-S3

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Emission Points EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21**

Process throughput:

1. The amount of gel coat used in Gel Coat Booths EP-S01, EP-S02, EP-S10, EP-S11, EP-S15 and EP-S21 shall not exceed 680,084 pounds in any monthly rolling 12-month period.
2. The VOC content of any gel coat used in Gel Coat Booths EP-S01, EP-S02, EP-S10, EP-S11, EP-S15 and EP-S21 shall not exceed 477 pounds per ton of gel coat used.
3. Emissions of organic HAP<sup>(1)</sup> shall not exceed 267 lbs per ton of gel coat used for white / off-white pigmented gel coats as calculated using the procedures in 40 CFR §63.5810.
4. Emissions of organic HAP<sup>(1)</sup> shall not exceed 377 lbs per ton of gel coat used for all other pigmented gel coats as calculated using the procedures in 40 CFR §63.5810.
5. The amount of organic peroxide catalyst used in Gel Coat Booths EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 shall not exceed 40,000 pounds in any monthly rolling 12-month period.
6. These emissions units shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastics Composites Production.
7. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

<sup>(1)</sup> Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Appendix E of this document.

## Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- 1) The permittee shall maintain the following monthly records:
  - a) The identification of any material used in the Gel Coat Booths.
  - b) The amount of gel coat used in the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in pounds.
  - c) The amount of catalyst used in the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in pounds.
  - d) The rolling 12-month total of the amount of gel coat used in the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in pounds.
  - e) The rolling 12-month total of the amount of catalyst used in the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in pounds.
  - f) The VOC and the organic HAP emission rate from the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in tons. The emissions from spray gel coat application shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63 Subpart WWWW, National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emission of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the gel coat are organic HAPs. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted from the Gel Coat Booths.
  - g) The rolling 12-month total of the VOC and the organic HAP emissions from the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21 in tons.
- 2) The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart WWWW. If applicable, the permittee shall also record the date that the facility switches compliance options.



- 3) Retain Material Safety Data Sheets (MSDS) for all materials used in the following Gel Coat Booths: EP-S01, EP-S02, EP-S10, EP-S11, EP-S15, and EP-S21t
- 4) Record on monthly basis, all maintenance (if any) of dry filters.

Authority for Requirement: First four Iowa DNR Construction Permits specified in Table B-2

DRAFT

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed in Table B-5.*

Table B-5			Stack Characteristics				
Emission Point Number	Emission Unit Number	Construction Permit #	Height (feet)	Discharge Style	Opening Diameter (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-S01	EU-S01	85-A-003-S4	26	vertical	42	ambient	18000
EP-S02	EU-S02	85-A-004-S4	26	vertical	42	ambient	18000
EP-S10	EU-S10	85-A-009-S4	30.5	vertical	48	ambient	18800
EP-S11	EU-S11	97-A-638-S3	30.5	vertical	48	ambient	18800
EP-S15	EU-S15	85-A-018-S4	25	vertical	42	ambient	14000
EP-S21	EU-S21	04-A-587-S3	30.5	vertical	36	ambient	18900

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Authority for Requirements: Iowa DNR Construction Permits specified in Table B-5.

### **Periodic Monitoring Requirements**

*The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.*

#### **Stack Testing:**

Pollutant – PM

1st Stack Test to be Completed by – April 16, 2003

Test Method – Iowa Compliance Sampling Manual Method 5

Authority for Requirement - Iowa DNR Construction Permits listed in Table B-5

*The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)*

Table B-6

Emission Point Number	Number of PM Tests Required	Test to be Completed by
EP-S01	(1)	
EP-S02	one	timely test conducted April 14-15, 2003 <sup>(2)</sup>
EP-S10	(1)	
EP-S11	(1)	

EP-S15	(1)	
EP-S21	(1)	

<sup>(1)</sup> For purposes of this permit, the stack testing required for emission point EP-S02 will represent the compliance testing for the emission points shown in the table above.

<sup>(2)</sup> In compliance with all the particulate limits referenced in Table B-2.

**Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐**

Gelcoat Booth Agency Operation & Maintenance Plan

Relevant requirements of O & M plan for this equipment (all emission points listed in Table B-2):

1. Weekly

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

2. Reporting & Record Keeping

- Maintenance and inspection records will be kept for five years and available upon request.

3. Quality Control

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

**Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒**

Authority for Requirement: 567 IAC 22.108(3)"b"

## Emission Point ID Number: See Table C-1

### Applicable Requirements

*The following requirements apply to the emission points identified in Table C-1.*

Table C-1

Emission Point Number	Control Equipment Number	Control Equipment Description	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (lb/hr)
EP-S03	H1-S03-C	dry filter	EU-S03	small parts chop spray-up booth	fiberglass resin	90.1
EP-S04	H1-S04-C	dry filter	EU-S04	small parts chop spray-up booth	fiberglass resin	90.1
EP-S05	H1-S05-C	dry filter	EU-S05	small parts chop spray-up booth	fiberglass resin	90.1
EP-S06	H1-S06-C	dry filter	EU-S06	small parts chop spray-up booth	fiberglass resin	90.1
EP-S07	H1-S07-C	dry filter	EU-S07	backwall chop spray-up booth	fiberglass resin	36.1
EP-S08	H1-S08-C	dry filter	EU-S08	backwall chop spray-up booth	fiberglass resin	36.1
EP-S09	H1-S09-C	dry filter	EU-S09	backwall chop spray-up booth	fiberglass resin	36.1
EP-S14	H1-S14-C	dry filter	EU-S14	offline chop spray-up booth	fiberglass resin	36.1

### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from each emission point identified in Table C-2 shall not exceed the following specified levels.*

Table C-2

Emission Point Number	Emission Unit Number	Opacity	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	VOC (ton/yr)	Iowa DNR Construction Permit #
EP-S03	EU-S03	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>	88.8 (2)	85-A-005-S5
EP-S04	EU-S04	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		85-A-006-S5
EP-S05	EU-S05	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		85-A-007-S5
EP-S06	EU-S06	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		85-A-008-S5
EP-S07	EU-S07	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		84-A-039-S6
EP-S08	EU-S08	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		85-A-011-S5
EP-S09	EU-S09	40% <sup>(1)</sup>	0.01	0.4	0.24 <sup>(3)</sup>		85-A-010-S5
EP-S14	EU-S14	40% <sup>(1)</sup>	0.01	0.4	0.18 <sup>(3)</sup>		85-A-017-S5

<sup>(1)</sup> Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of “No Visible Emissions” will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an “indicator opacity exceedence report” with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

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<sup>(2)</sup> Bubble limit – total VOCs shall not exceed 88.8 tons per twelve-month rolling total for Small Parts Chop Spray-up Booths (EP-S03, S04, S05, S06) and Backwall Chop Spray-up Booths (EP-S07, S08, S09, S14).

<sup>(3)</sup> Limits requested by the permittee.

Table C-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	Iowa DNR Construction Permits referenced in Table C-2 567 IAC 23.3(2)"d"
PM	0.01 gr/scf	Iowa DNR Construction Permits referenced in Table C-2 567 IAC 23.4(13)
PM	0.40 lb/hr	Iowa DNR Construction Permits referenced in Table C-2
PM <sub>10</sub>	0.40 lb/hr	Iowa DNR Construction Permits referenced in Table C-2
VOC	88.8 tons/yr →	First seven Iowa DNR Construction Permits referenced in Table C-2 85-A-005-S5, 85-A-006-S5, 85-A-008-S5, 85-A-039-S6, 85-A-011-S5, 85-A-010-S5, and 85-A-017-S5

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Emission Points EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09 and EP-014**

Process throughput:

1. The amount of resin material used in Chop spray Booths EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, and EP-S14 shall not exceed 1,829,787 pounds in any monthly rolling 12-month period.
2. The VOC content of any resin used in Chop Spray Booths EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, and EP-S14 shall not exceed 188 pounds per ton of resin used.
3. Emissions of organic HAP<sup>(1)</sup> shall not exceed 88 lbs per ton of resin used as calculated using the procedures in 40 CFR §63.5810.
4. The amount of organic peroxide catalyst used in Chop Spray Booths EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, and EP-S14 shall not exceed 108,000 pounds in any monthly rolling 12-month period.
5. This emission unit shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production.
6. Maintain dry filters according to manufacturers specifications and maintenance schedule.

<sup>(1)</sup> Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Appendix E of this document.

## Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- 1) The permittee shall maintain the following monthly records:
  - a) The identification of any material used in the Chop Spray Booths.
  - b) The VOC and the organic HAP content of any resin used in the following Chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14
  - c) The amount of resin used in the following Chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in pounds.
  - d) The amount of catalyst used in the following chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in pounds.
  - e) The rolling 12-month total of the amount of resin used in the following Chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in pounds.
  - f) The rolling 12-month total of the amount of catalyst used in the following Chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in pounds.
  - g) The VOC and the organic HAP emission rate from the following Chop spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in tons. The emissions from spray resin application (i.e. mechanical resin application) shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63, subpart WWWW, National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emissions of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the resin are organic HAPs. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted from the Chop Spray Booths.
  - h) The rolling 12-month total of the VOC and the organic HAP emissions from the following Chop Spray Booths: EP-S03, EP-S04, EP-S05, EP-S06, EP-S07, EP-S08, EP-S09, and EP-S14 in tons.
- 2) The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart WWWW. If applicable, the permittee shall also record the date that the facility switches compliance options.
- 3) Retain Material Safety Data Sheets (MSDS) for all materials used in the Small Parts Chop Spray-up Booth (EP-S03), Small Parts Chop Spray-up Booth (EP-S04), Small Parts Chop Spray-up Booth (EP-S05), Small Parts Chop Spray-up Booth (EP-S06),

Backwall Chop Spray-up Booth (EP-S07), Backwall Chop Spray-up Booth (EP-S08), Backwall Chop Spray-up Booth (EP-S09), and Offline chop Spray booth (EP-S14).

4) Record on monthly basis, all maintenance (if any) of dry filters.

Authority for Requirement: First seven Iowa DNR Construction Permits listed in Table C-2

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed in Table C-5.*

Table C-5			Stack Characteristics				
Emission Point Number	Emission Unit Number	Construction Permit #	Height (feet)	Discharge Style	Opening Diameter (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-S03	EU-S03	85-A-005-S5	24	vertical	42	ambient	19059
EP-S04	EU-S04	85-A-006-S5	24	vertical	42	ambient	19059
EP-S05	EU-S05	85-A-007-S5	24	vertical	42	ambient	19059
EP-S06	EU-S06	85-A-008-S5	24	vertical	42	ambient	19059
EP-S07	EU-S07	84-A-039-S6	28	vertical	42	ambient	19059
EP-S08	EU-S08	85-A-011-S5	28	vertical	42	ambient	19059
EP-S09	EU-S09	85-A-010-S5	28	vertical	42	ambient	19059
EP-S14	EU-S14	85-A-017-S5	26.5	vertical	42	ambient	14000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Authority for Requirements: Iowa DNR Construction Permits listed in Table C-5.

### **Periodic Monitoring Requirements**

*The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.*

#### **Stack Testing:**

Pollutant – PM

1st Stack Test to be Completed by – April 16, 2003

Test Method – Iowa Compliance Sampling Manual Method 5

Authority for Requirement - Iowa DNR Construction Permits listed in Table C-5

*The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance*

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*evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)*

Table C-6

Emission Point Number	Number of PM Tests Required	Test to be Completed by
EP-S03	(1)	
EP-S04	one	timely test conducted April 14-15, 2003 <sup>(2)</sup>
EP-S05	(1)	
EP-S06	(1)	
EP-S07	(1)	
EP-S08	(1)	
EP-S09	(1)	
EP-S14	(1)	

<sup>(1)</sup> For purposes of this permit, the stack testing required for emission point EP-S04 will represent the compliance testing for the emission points shown in the table above.

<sup>(2)</sup> In compliance with all the particulate limits referenced in Table C-2.

**Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐**

Chop Spray-Up Booth Agency Operation & Maintenance Plan

Relevant requirements of O & M plan for this equipment (all emission points listed in Table C-2):

1. Weekly

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

2. Reporting & Record Keeping

- Maintenance and inspection records will be kept for five years and available upon request.

3. Quality Control

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

**Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒**

Authority for Requirement: 567 IAC 22.108(3)"b"



## Emission Point ID Number: See Table D-1

### Applicable Requirements

*The following requirements apply to the emission points identified in Table D-1.*

Table D-1

Emission Point Number	Control Equipment Number	Control Equipment Description	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
EP-S16	H1-S16-C	dry filter	EU-S16	paint/foam/grind booth <sup>(1)</sup>	paint, foam	0.148 gal/hr
EP-S17	H1-S17-CE	dry filter	EU-S17	foam application booth	urethane foam	13.8 lb/hr
EP-S18	H1-S18-CE	dry filter	EU-S18	tooling gelcoat/chop booth	fiberglass resin, gel coats	7.2 lb/hr
EP-S19	H1-S19-CE	dry filter	EU-S19	reactive hot melt glue machine	urethane hot-melt adhesives	210.5 lb/hr
EP-S20	H1-S20-CE	dry filter	EU-S20	paint booth	paint	18 oz/min

<sup>(1)</sup> internally vented

### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from each emission point identified in Table D-2 shall not exceed the following specified levels.*

Table D-2

Emission Point Number	Emission Unit Number	Opacity	PM (gr/scf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	VOC (ton/yr)	Iowa DNR Construction Permit #
EP-S16	EU-S16	40% <sup>(1)</sup>	0.01	0.27	0.27	3.9 <sup>(2)</sup>	99-A-337-S5
EP-S17	EU-S17	40% <sup>(1)</sup>	0.01	NA	0.06	NA	00-A-582-S4
EP-S18	EU-S18	40% <sup>(3)</sup>	0.01	0.1	0.07 <sup>(2)</sup>	4.1 <sup>(2)</sup>	94-A-093-S5
EP-S19	EU-S19	40% <sup>(1)</sup>	0.01	0.03	0.03	NA	00-A-979-S1
EP-S20	EU-S20	40% <sup>(1)</sup>	0.01	0.39	0.39	15.0 <sup>(2)</sup>	01-A-191-S3

<sup>(1)</sup> Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of “No Visible Emissions” will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an “indicator opacity exceedence report” with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Limit requested by the permittee.

<sup>(3)</sup> Per DNR air Quality Policy 3-b-08, Opacity Limits, if visible emissions are observed other than start-up, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Table D-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	Iowa DNR Construction Permits referenced in Table D-2 567 IAC 23.3(2)"d"
PM	0.01 gr/scf	Iowa DNR Construction Permits referenced in Table D-2 567 IAC 23.4(13)
PM	lb/hr	Iowa DNR Construction Permits referenced in Table D-2, except 00-A-582-S3
PM <sub>10</sub>	lb/hr	Iowa DNR Construction Permits referenced in Table D-2
VOC	3.9 tons/yr 4.1 tons/yr 15.0 Tons/yr	Iowa DNR Construction Permit 99-A-337-S5 Iowa DNR Construction Permit 94-A-093-S5 Iowa DNR Construction Permit 01-A-191-S3

### **Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Process throughput:**

1. EP-S16:

- a) is limited to the use of a two-part urethane mixture;
- b) is limited to usage of 96,000 lbs of foam-urethane mixture per rolling 12-month period;
- c) is limited to 1300 gallons of paints and thinners per rolling 12-month period;
- d) is limited to a maximum VOC content of 6.0 lb/gal for all paints and thinners used;
- e) shall maintain dry filters in accordance with manufacturer's specifications and maintenance schedule.

2. EP-S17:

- a) is limited to the use of a two-part urethane mixture;
- b) is limited to usage of 96,000 lbs of foam-urethane mixture per rolling 12-month period;
- c) shall maintain dry filters in accordance with manufacturer's specifications and maintenance schedule.

3. EP-S18:

- a) The amount of resin and gel coat used in the Tooling Gelcoat/chop Booth shall not exceed 29,630 pounds in any monthly rolling 12-month period.
- b) The VOC content of any combination of resin and gel coat used in the Tooling gelcoat/chop booth shall not exceed 540 pounds per ton of material used.

- c) Emissions of organic HAP<sup>(1)</sup> shall not exceed 440 lbs per ton of material used as calculated using the procedures in 40 CFR §63.5810.
- d) The amount of organic peroxide catalyst used in the Tooling Gelcoat/ Chop Booth shall not exceed 1,800 pounds in any monthly rolling 12-month period.
- e) The Tooling Gelcoat Chop Booth shall comply with all applicable requirements from 50 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production.
- f) The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

4. EP-S20:

- a) This emission unit shall comply with all applicable requirements from 40 CFR Part 63, Subpart PPPP - NESHAP for Surface Coating of Plastic Parts and Products and 40 CFR Part 63, Subpart MMMM - NESHAP for Surface Coating of Miscellaneous Metal Parts and Products.
- b) is limited to 5000 gallons of paints and thinners per rolling 12-month period;
- c) is limited to a maximum VOC content of 6.0<sup>3</sup> lb/gal, as sprayed, for all paints and thinners used;
- d) the spray booth shall not operate more than one spray gun at a time;
- e) shall maintain dry filters in accordance with manufacturer's specifications and maintenance schedule.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. EP-S16:

- a) The permittee shall record monthly the amount of foam-urethane material used, in pounds. The permittee shall calculate and record rolling 12-month totals;
- b) The permittee shall record on a monthly basis the amount of paint and thinners used in EP-S16, in gallons. The permittee shall calculate and record rolling 12-month totals;
- c) The permittee shall record the VOC content of all paints and thinners used in EP-S16, in lb/gallons;
- d) The permittee shall retain Material Safety Data Sheets (MSDS) for all materials used in EP-S16.

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<sup>3</sup> Once the 40 CFR Part 63 Subpart PPPP and 40 CFR Part 63 Subpart WWWW compliance deadline date has passed, compliance with this emission limitation will not indicate compliance with the appropriate NESHAP applicable to this emission point.

- e) The permittee shall record on a monthly basis all maintenance (if any) of dry filters.

2. EP-S17:

- a) The permittee shall record on a monthly basis the amount of foam-urethane material used in EP-S17, in pounds. The permittee shall Calculate and record rolling 12-month totals;
- b) The permittee shall retain Material Safety Data Sheets (MSDS) for all materials used in EP-S17;
- c) The permittee shall record on a monthly basis all maintenance (if any) of dry filters.

3. EP-S18:

- (a) The permittee shall maintain the following monthly records:
  - i) The identification of any material used in EP-S18
  - ii) The VOC and the organic HAP content of any resin and gel coat used in EP-S18
  - iii) The amount of resin and gel coat used in EP-S18 in pounds.
  - iv) The amount of catalyst used in EP-S18 in pounds.
  - v) The rolling 12-month total of the amount of resin and gel coat used in EP-S18 in pounds.
  - vi) The rolling 12-month total of the amount of catalyst used in EP-S18 in pounds.
  - vii) The VOC and the organic HAP emission rate from EP-S18 (tons). The emissions from this emission unit shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63 Subpart WWWW, NESHAP for Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emissions of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the resin and gel coat are organic HAPs. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted in the Tooling Gelcoat/ Chop Booth.
  - viii) The rolling 12-month total of the VOC and the organic HAP emissions from EP-S18.
- (b) The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart WWWW. If applicable, the permittee shall also record the date that the facility switches compliance options.
- (c) retain MSDS sheets for all materials used in EP-S18;
- (d) The permittee shall record on a monthly basis all maintenance performed on the control equipment.

4. EP-S19:
  - a) record on an annual basis the amount of adhesive used;
  - b) retain MSDS sheets for all materials used.
5. EP-S20:
  - a) The permittee shall record the compliance option being used by the facility to show compliance with NESHAP Subpart PPPP and NESHAP Subpart MMMM. If applicable, the permittee shall also record the date that the facility switches compliance options.
  - b) The permittee shall record on a monthly basis the amount of paint and thinners used in EP-S20 in gallons. The permittee shall calculate and record rolling 12-month totals.
  - c) The permittee shall record the VOC content of all paints and thinners used in EP-S20 in pounds per gallon.
  - d) The permittee shall retain Material Safety Data Sheets (MSDS) for all materials used in EP-S20.
  - e) The permittee shall record on a monthly basis all maintenance (if any) of the dry filters.

#### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed in Table D-5.*

Table D-5			Stack Characteristics				
Emission Point Number	Emission Unit Number	Construction Permit #	Height (feet)	Discharge Style	Opening Diameter (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-S16 <sup>(1)</sup>	EU-S16	99-A-337-S5	NA	NA	NA	NA	NA
EP-S17	EU-S17	00-A-582-S4	35	vertical	24	ambient	7500
EP-S18	EU-S18	94-A-093-S5	23	vertical	34	ambient	11089
EP-S19	EU-S19	00-A-979-S1	33	vertical	8	ambient	585
EP-S20	EU-S20	01-A-191-S3	33	vertical	34	ambient	15750

<sup>(1)</sup> internally vented

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Authority for Requirements: Iowa DNR Construction Permits specified in Table D-5.

**Periodic Monitoring Requirements**

*The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.*

No periodic monitoring is required at this time.

**Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐**

**Production Booth Agency Operation & Maintenance Plan**

Relevant requirements of O & M plan for this equipment (all emission points in Table D-2):

4. Weekly

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

5. Reporting & Record Keeping

- Maintenance and inspection records will be kept for five years and available upon request.

6. Quality Control

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

**Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒**

Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Number: See Table E-1**

**Applicable Requirements**

*The following requirements apply to the emission points identified in Table E-1.*

Table E-1

Emission Point Number	Control Equipment Number	Control Equipment Description	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (lb/hr)
EP-909-F	NA	NA	EU-909-F	tool repair <sup>(1)</sup>	tool repair materials	2.1
EP-910-F	NA	NA	EU-910-F	tool building <sup>(1)</sup>	tool bldg materials	24.5
EP-920-F	NA	NA	EU-920-F	fabrication/off-line <sup>(1)</sup>	fab/off-line materials	121.0
EP-923-F	NA	NA	EU-923-F	finish sealants/adhesives <sup>(1)</sup>	finish sealants/adhesives	16.2
EP-924-F	NA	NA	EU-924-F	aluminum prep <sup>(1)</sup>	misc. finishing sealants & adhesives	1.15

<sup>(1)</sup> fugitive sources

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from each emission point identified in Table E-1 shall not exceed the following specified levels.*

Pollutant: Fugitive Dust

Emission Points: Those listed in Table E-1

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

**Periodic Monitoring Requirements**

*The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒**

**Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒**

Authority for Requirement: 567 IAC 22.108(3)"b"

Winnebago Industries, Inc. - Hampton

03-TV-018-M001

11/14/06



## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

### G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105(2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108(1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108(14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108(9)"b"*

### G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

### G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107(4)*

### G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the



basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6. Annual Fee**

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
  - a. Form 1.0 "Facility Identification";
  - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
  - c. Form 5.0 "Title V annual emissions summary/fee"; and
  - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
  - a. Form 1.0 "Facility Identification";
  - b. Form 5.0 "Title V annual emissions summary/fee";
  - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.

7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.

8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

**G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

**G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

**G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

**G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.

- e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

**G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

**G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

**G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity,

strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

#### **G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

#### **2. Excess Emissions Reporting**

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.

- ii. The estimated quantity of the excess emission.
  - iii. The time and expected duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps being taken to remedy the excess emission.
  - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
  - vi. The steps that were taken to limit the excess emission.
  - vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*
3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The facility at the time was being properly operated;
  - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
  - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-



annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

#### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)

#### **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act.
  - e. The changes comply with all applicable requirements.
  - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade
    - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
    - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
    - vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 22.110(1)

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*
5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103(2)*
6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

#### **G18. Duty to Modify a Title V Permit**

##### **1. Administrative Amendment.**

- a. An administrative permit amendment is a permit revision that is required to do any of the following:
  - i. Correct typographical errors
  - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - iii. Require more frequent monitoring or reporting by the permittee; or
  - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

##### **2. Minor Permit Modification.**

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
  - i. Do not violate any applicable requirements
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.

- iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
- iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
- v. Are not modifications under any provision of Title I of the Act; and
- vi. Are not required to be processed as significant modification.

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
- ii. The permittee's suggested draft permit
- iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
- iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)



### **G19. Duty to Obtain Construction Permits**

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1)

### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. 567 IAC 23.1(3)"a", and 567 IAC 23.2

### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 *except* 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited.

Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
  5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
  - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*
3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that

determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements.

*567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

#### **G25. Permit Shield**

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *567 IAC 22.108 (18)*

#### **G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

#### **G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

**G29. Disclaimer**

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

**G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau  
7900 Hickman Road, Suite #1  
Urbandale, IA 50322  
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

**G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

**G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits  
EPA Region 7  
Air Permits and Compliance Branch  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
7900 Hickman Road, Suite #1  
Urbandale, IA 50322  
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

**Field Office 1**  
909 West Main – Suite 4  
Manchester, IA 52057  
(563) 927-2640

**Field Office 2**  
P.O. Box 1443  
2300-15th St., SW  
Mason City, IA 50401  
(641) 424-4073

**Field Office 3**  
1900 N. Grand Ave.  
Spencer, IA 51301  
(712) 262-4177

**Field Office 4**  
1401 Sunnyside Lane  
Atlantic, IA 50022  
(712) 243-1934

**Field Office 5**  
401 SW 7<sup>th</sup> Street, Suite I  
Des Moines, IA 50309  
(515) 725-0268

**Field Office 6**  
1004 W. Madison  
Washington, IA 52353  
(319) 653-2135

**Polk County Public Health Dept.**  
Air Quality Division  
5885 NE 14th St.  
Des Moines, IA 50313  
(515) 286-3351

**Linn County Public Health Dept.**  
Air Pollution Control Division  
501 13th St., NW  
Cedar Rapids, IA 52405  
(319) 892-6000